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10 *Attorneys for Defendant*  
11 *Tesla, Inc. aka Tesla Motors, Inc.*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 TERRANCE DOBBINS,

15 Plaintiff,

16 vs.

17 TESLA, INC., (a.k.a. TESLA MOTORS, INC.)  
18 a Delaware Corporation; DOES I-X; and, ROE  
19 Business Entities I-X,

20 Defendants.

21 Case No.

22 **NOTICE TO FEDERAL COURT OF  
REMOVAL OF CIVIL ACTION  
FROM STATE COURT**

23 Pursuant to 28 U.S.C. § 1332(d), Defendant hereby notifies the Court of the removal of  
24 *Terrance Dobbins v. Tesla, Inc., (a.k.a. Tesla Motors, Inc.) a Delaware Corporation; DOES I-X;*  
25 *and, ROE Business Entities I-X.*, Case No. A-21-838852-C, which was filed in the Eighth Judicial  
26 District Court in Clark County, Nevada. In support of said removal, Defendant states as follows:

27 1. On August 3, 2021, an action was commenced in the Eighth Judicial District Court  
28 of Clark County, Nevada, entitled *Terrance Dobbins v. Tesla, Inc., (a.k.a. Tesla Motors, Inc.) a*  
*Delaware Corporation; DOES I-X; and, ROE Business Entities I-X.* A copy of the Complaint is  
attached hereto as **Exhibit A**.

2. Defendant was served on August 10, 2021 with a copy of the Complaint and a  
Summons issued by the state court on or about August 6, 2021. A copy of the Summons is attached  
hereto as **Exhibit B**.

3. This action is properly removed to federal court under federal question jurisdiction because Plaintiff's Complaint contains claims which arise under federal law, specifically, Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e and the Civil Rights Act of 1866, 42 U.S.C. § 1981. *See* 28 U.S.C. § 1441.

4. This Notice of Removal is being filed within thirty (30) days of receipt of any pleadings setting forth the claim for relief upon which the action is based and is, therefore, timely under 28 U.S.C. § 1331 and § 1446(b).

5. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this court pursuant to the provisions of 28 U.S.C. § 1441(b), in that it is a civil action arising under the Constitution, laws, or treaties of the United States. Specifically, Plaintiff alleges conduct in violation of the Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e and the Civil Rights Act of 1866, 42 U.S.C. § 1981. Any remaining state law claims are also properly removed pursuant to the Court's supplemental jurisdiction. 28 U.S.C. § 1337(a).

6.       Venue is proper in this Court as this is the court for the district and division embracing the place where the action is pending in state Court. 28 U.S.C. § 1391.

WHEREFORE, Defendants pray that the above-referenced action now pending in the Eighth Judicial District Court of the State of Nevada in and for the County of Clark be removed therefrom to this Court.

Dated this 31st day of August, 2021.

JACKSON LEWIS P.C.

/s/ Deverie J. Christensen  
Deverie J. Christensen, Bar # 6596  
Joshua A. Slicker, Bar # 12493  
300 South Fourth Street, Suite 900  
Las Vegas, Nevada 8910

*Attorneys for Defendant*

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of Jackson Lewis P.C., and that on this 31st day of August, 2021, I caused to be served via the Court's CM/ECF Filing, a true and correct copy of the above foregoing **NOTICE TO FEDERAL COURT OF REMOVAL OF CIVIL ACTION FROM STATE COURT** properly addressed to the following:

James P. Kemp, Esq.  
Kemp & Kemp  
7435 W. Azure Drive, Ste. 110  
Las Vegas, Nevada 89130

*Attorney for Plaintiff  
Terrance Dobbins*

/s/ Kelley Chandler  
Employee of Jackson Lewis P.C.

4851-6089-9576, v. 1